



EPA

United States Environmental Protection Agency  
Washington, D.C. 20460

## Water Compliance Inspection Report

## Section A: National Data System Coding (i.e. PCS)

Transaction Code		NPDES										yr/mo/day					Inspection Type		Inspector		Fac Type							
1	N	2	5	3	I	D	G	1	3	1	0	0	3	11	12	1	4	0	7	2	3	17	18	C	19	S	20	3
Remarks																												

21 D W O R S H A K N A T I O N A L F I S H H A T C H E R Y 66

Inspection Work Days      Facility Self-Monitoring Evaluation Rating      BI      QA      Reserved

67 5 69      70 5      71 N      72 N      73 74 75 80

## Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number)

Dworshak National Fish Hatchery

276 Dworshak Complex Drive

Orofino, Idaho 83544

Entry Time/Date  
7/23/2014 9:00

Permit Effective Date  
DECEMBER 1, 2007

Exit Time/Date  
7/23/2014 13:00

Permit Expiration Date	30-Nov-12
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Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Numbers  
Mr. Mark Drobish - Hatchery Manager  
208-476-2236

Other Facility Data (e.g., SIC, NAICS, and other descriptive information)

SIC = 0273 (Animal Aquaculture)  
NAICS = 112511

Name, Address of Responsible Official/Title/Phone and Fax Number  
Mr. Mark Drobish - Hatchery Manager Telephone # - 208-476-2236  
276 Dworshak National Fish Hatchery FAX# 208-476-3252  
Orofino, Idaho 83544

☒ Yes
 ☐ No

## Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

<input checked="" type="checkbox"/>	Permit		Self-Monitoring Program		Pretreatment	<input type="checkbox"/>	MS4
<input checked="" type="checkbox"/>	Records/Reports		Compliance Schedule		Pollution Prevention		
<input checked="" type="checkbox"/>	Facility Site Review	<input checked="" type="checkbox"/>	Laboratory		Storm Water		
<input checked="" type="checkbox"/>	Effluent/Receiving Waters	<input checked="" type="checkbox"/>	Operations & Maintenance		Combined Sewer Overflow		
<input checked="" type="checkbox"/>	Flow Measurement	<input checked="" type="checkbox"/>	Sludge Handling/Disposal		Sanitary Sewer Overflow		

## Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes	SEV Description
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	

RECEIVED

OCT 10 2014

Inspection & Enforcement Management Unit  
(IEMU)

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
Michael Spomer <i>Michael Spomer</i>	Idaho Dept. of Environmental Quality - 208-373-0232	8/6/2014
A.J. Maupin, P.E. <i>A.J. Maupin</i>	IDEQ State Office / 208-373-0167 / 208-373-0576	29 Sept 2014

EPA Form 3560-3 (Rev 1-06) Previous editions are obsolete

ICIS,  
10-31-2014  
JBrown





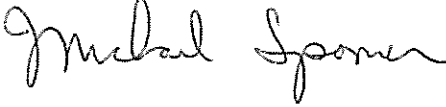
## Idaho Department of Environmental Quality

### AQUACULTURE FACILITY INSPECTION SURVEY

General NPDES Permit Numbers IDG-131003

Effective: December 1, 2007 - November 30, 2012

<b>PURPOSE OF INSPECTION:</b>	Determination of compliance with NPDES permit and the Clean Water Act.
<b>TYPE OF INSPECTION:</b>	<input type="checkbox"/> Unannounced <input checked="" type="checkbox"/> Announced <input type="checkbox"/> CSI <input checked="" type="checkbox"/> CEI <input type="checkbox"/> Recon
<b>DATE(s) OF PREVIOUS NPDES INSPECTIONS:</b>	Date: <b>October 2012</b>
<b>PENDING OR CURRENT ENFORCEMENT ACTIONS:</b> (review NOV and warning letters on file)	NOV Letter from EPA dated December 11, 2008 and a Notice of Continuing Noncompliance dated February 9, 2011 to correct 1. Cleaning practices on Burrow System III 2. Use of standard flow measuring devices
<b>FACILITY NAME:</b>	Dworshak National Fish Hatchery
<b>NPDES PERMIT #</b>	IDG-131003
<b>FACILITY CONTACT:</b>	Name: Mr. Mark Drobish Hatchery Manager  Phone Number: 208-476-4591 (office) Email: mark_drobish@fws.gov
<b>FACILITY SIZE</b> (annual fish production; affects frequency of monitoring requirements in parentheses) Confirm production and monitoring frequency during the inspection.	<input type="checkbox"/> > 500,000 (monthly) <input checked="" type="checkbox"/> 100,000 - 500,000 (quarterly) <input type="checkbox"/> < 100,000 (semi-annual) <input type="checkbox"/> Other (explain)
<b>INSPECTOR(s) AND AFFILIATION</b>  <b>RECEIVED</b>  OCT 10 2014	Michael Spomer Idaho Department of Environmental Quality Technical Services – State Office  Nicolas Hiebert – Inspector in Training Idaho Department of Environmental Quality Lewiston Regional Office

<b>DATE OF INSPECTION:</b>	<b>Date: July 23, 2014</b> <b>Arrival Time: 9 am</b> <b>Departure Time: 1:00 pm</b>
<b>Photo of facility sign, if any, and facility</b>	
<b>DATE OF FINAL REPORT</b>	<b>Date: September 3, 2014</b> 



### ENTRY AND PERMIT CONDITIONS REVIEW

X Present your credentials and provide a business card; explain the purpose of the inspection and how you plan to proceed.

<b>Interviewee Questions</b>	
1. Obtain representative's name, position, and phone number.	<b>Name: Mark Drobish</b> <b>Position: Hatchery Manager</b> <b>Phone: 208-476-4591</b>
2. How long has the representative worked for the company?	<b>6 years at this location</b>
3. How long has he/she held the position?	<b>6 years</b>
4. Are there other representatives who were present?	<b>Greg Parker – Army Corp. of Engr.</b> <b>Michael Tuell – Nez Perce Tribe</b> <b>John Stuto – Army Corp. of Engr.</b> <b>Adam Izbicki – US Fish and Wildlife Service</b> <b>Lucian Stewart – Army Corp of Engr.</b>
<b>NOI Review:</b> Show the interviewee the NOI, and ask him/her to review it for errors. If errors are found, ask him/her to correct the errors and initial the corrections. A new NOI should be submitted if several corrections are made.	
1. What is the date of the most recently submitted NOI? <b>May 8, 2012</b>	
2. Is the NOI complete and current?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
3. Have any structural changes been made to the facility recently?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
4. Any structural changes anticipated? (Plan and Spec review required of IDEQ, if so; see page 47; Part VI.I.2.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <b>A rehabilitation study is currently under way that may impact changes to the facility.</b>
<b>FACILITY LOCATION, ETC: (see NOI)</b>	<b>Address: 276 Dworshak Complex Dr.</b> <b>Orofino, Idaho 83544</b> <b>Phone: 208-476-2236</b> <b>Fax: 208-476-3252</b>

<b>OWNER NAME:</b>	U.S Army Corp of Engineers
<b>OWNER ADDRESS:</b>	Corps of Engineers Address: 201 N. 3 <sup>rd</sup> Ave Walla Walla , Wa 99362-1876  Phone Number: 509-527-7121 Fax: 509-527-7820 E-mail: damian.j.walter@usace.army.mil
<b>OPERATOR NAME:</b>	Dept. of Interior – U.S. Fish and Wildlife Service
<b>OPERATOR ADDRESS:</b>	Address: P.O. Box 18 Ahsahka, Idaho 83520-0018  276 Dworshak Complex Dr. Orofino, Idaho 83544  Phone Number: 208-476-4591 Fax: 208-476-3252 E-mail: mark_drobish@fws.gov
<b>PERMIT TRANSFERS:</b>	
1. Is this a new operator?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No X
According to VII. I. "Transfers. Authorization to discharge under this permit may be automatically transferred to a new permittee on the date specified in the agreement only if: 1. The current permittee notifies the Director of the Office of Water and Watersheds at least 30 days in advance of the proposed transfer date; 2. The notice includes a written agreement between the existing and new permittees containing a specific date for transfer of permit responsibility and liability between them; and 3. The Director does not notify the existing permittee and the new permittees of its intent to revoke and reissue the authorization to discharge.	
2. Was EPA and IDEQ notified in writing of the transfer?	<input type="checkbox"/> Yes <input type="checkbox"/> N/A <input type="checkbox"/> No
<b>LOCATION OF FACILITY:</b>	GPS taken at entrance to facility. Latitude: 46° 30' 8.15" N  Longitude: -116° 19' 19.37" W  Date: July 23, 2014  Time: 9 a.m.  GPS estimated via Google Earth

<b>AUTHORIZATION TO DISCHARGE</b>	
1. Did you receive a letter authorizing you to discharge?	<input type="checkbox"/> Yes <b>X</b> <input type="checkbox"/> No
2. "Addressee" on the authorization to discharge letter:	Name: <b>Army Corp of Engineers US Fish and Wildlife Service</b>
3. Is this correct?	Yes - <b>X</b> <input type="checkbox"/> No: name _____
4. Do you have a copy of the permit?	<input type="checkbox"/> Yes <b>X (both an electronic copy and a hard copy were available)</b> <input type="checkbox"/> No
5. Is the facility currently discharging?	<input type="checkbox"/> Yes <b>X</b> <input type="checkbox"/> No
6. Was the facility containing, growing or holding fish on December 1, 2007 (effective date of the permit)?	<input type="checkbox"/> Yes <b>X</b> <input type="checkbox"/> No
7. If not currently discharging, when do you expect to rear fish again at this facility?	<input type="checkbox"/> N/A Date: _____
8. Do you plan to participate in Pollutant Trading?	<input type="checkbox"/> Yes <input type="checkbox"/> No <b>X</b>
(We will add more questions later once pollutant trading starts to happen.)	
<b>PROHIBITED DISCHARGES, Part II.B., Page 12</b> Review the prohibited discharges 1 and 2 (a-h) with the interviewee. <b>I did review the Permit Language with the hatchery staff at the time of the inspection.</b>	
1. Have you had any such prohibited discharges that you know of since December 1, 2007?	<input type="checkbox"/> Yes <input type="checkbox"/> No <b>X</b>
2. Do you expect to have any difficulty prohibiting such discharges from this facility?	<input type="checkbox"/> Yes <input type="checkbox"/> No <b>X</b>
Questions or Comments:	

<b>PROHIBITED PRACTICES, Part II.C., Pages 12</b>	
1. Review the prohibited practices 1 through 2 with the interviewee. <b>I did review the permit language with the hatchery staff at the time of the inspection.</b>	
2. Have you or any other employee engaged in any of these prohibited practices that you know of since December 1, 2007?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No X
3. Do you expect to have any difficulty prohibiting such practices at this facility?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No X
Questions or Comments:	
<b>FACILITY MONITORING, Part II.D., (see page 13)</b> Ask to see the recent DMRs and raw data. Review to determine if the permittee is filling in the correct data (influent, effluent raw data, and effluent net). See page 30, II.D.2.b., for requirement when data are less than MDL.  According to II. D., "The permittee shall monitor discharges from all outfalls authorized under the permit as specified in Tables 12 and 13..." (see pages 30-33) For frequency requirements, see footnote 16 of Table 12, and footnote 29 of Table 13 for OLSBs)	
1. When was the last monitoring event?	<b>July 9, 2014</b>
2. Who conducted the monitoring?	<b>Site Biologists (Jeremy Sommer or Tom Tighe)</b>
3. Is this the person who usually conducts the monitoring?	<input type="checkbox"/> Yes X <input type="checkbox"/> No
3. What is the interval of discrete sampling for the composite sample? (permit requires four or more discrete samples taken at one-half hour intervals or greater in a 24 hour period.)	<b>They collect 4 discrete grab samples at least ½ hour apart and composite.</b>
4. When sampling raceway discharge, is at least one sample taken during quiescent zone or raceway cleaning?	<input type="checkbox"/> Yes X <input type="checkbox"/> No
If not, why not.	
5 What type of sample are you taking for influent? (permittees with spring influents may elect to take grabs, page 32, footnote 17)	<b>Grab samples from the reservoir vault and the river inlet.</b>
6. Who fills out the DMRs?	<b>Nathan Wiese</b>



7. When was the most recent DMR submitted to EPA and IDEQ?	June 2014 – using electronic submittal.
<p>8. How and where is flow measured for the raceways?</p> <p>The facility has several magnetic flow meters and also measures the flow out of the standpipes at the outlet of each raceway. A Water Stick Flow Gauge (Warren Water Brooms Mfg.) is used to measure the amount of water flow over the standpipe out of the raceways and burrows.</p> <p>During the facility inspection, Mr. Drobish did point out that during the months of March through July, a portion (10%) of the nursery effluent flow is diverted around the clarifiers and is discharged directly to the clarifier system I outlet. If this nursery effluent is not bypassed, the water backs up in the nursery. He indicated this situation is being evaluated in the Hatchery Rehabilitation study currently in progress.</p> <p>And by whom? Hatchery operational staff</p> <p>Is this flow measurement method one of those specified in Appendix C. Part I.A., page 49?</p> <p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No –X (This issue was noted in the Notice of Violation issued on December 11, 2008 and again in the Notice of Continuing Noncompliance issued on February 9, 2011).</p>	
<p>9. How is the flow measuring device calibrated? And by whom?</p> <p>The facility uses a Water Stick Flow Gauge (Warren Water Brooms Mfg.) to measure the amount of water flow over the standpipe. The Francis Formula (Piper et al 1982, attachment 1) is used for calculating flow rates. The measurement of the depth of the crest of flow in inches is converted using a modified Francis Formula value (gpm/cfs) and diameter of the standpipe, to determine the flow rate. No calibration is done, since mathematical formulas and a ruler are used to determine flow.</p>	
<p>10. How and where is flow measured for the offline settling basins?</p> <p>And by whom?</p>	<p>A totalizing flow meter was installed in 2013.</p> <p>Daily readings are taking by operational staff. (LouAnn Lasswell or Rob Bohn)</p>
11. Was net effluent load recorded on the DMR calculated correctly? (check a few DMRs; see Appendix D, page 53 for equations)	<p><input type="checkbox"/> Yes X</p> <p><input type="checkbox"/> No</p>

12. Are you aware of any recent violations of the permit limits?  What was the limit that was exceeded?  When was it?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No X
13. Are the data reported properly on the DMR?	<input type="checkbox"/> Yes X <input type="checkbox"/> No
14. Are DMR data consistent with analytical results?	<input type="checkbox"/> Yes X <input type="checkbox"/> No
<b>RECEIVING WATER MONITORING, Part II.E., (see pages 14-15)</b> According to II.C.1., "All permittees with OLSB that discharge directly to receiving water must conduct receiving water monitoring for ammonia, pH, and temperature upstream from the outfall." And 2., "All facilities using chelated copper compounds or copper sulfate must monitor total recoverable copper and hardness immediately upstream of the outfall at least once in any quarter when these compounds are applied..."  Ask to see the QA plan which will describe where the samples are taken in the receiving stream.	
1. If the facility has an OLSB discharging to a receiving stream.... Are you monitoring receiving water for ammonia, pH, and temperature?	<input type="checkbox"/> Yes X <input type="checkbox"/> No
2. Are you monitoring receiving water for copper quarterly when you use it?  Not using copper chemicals at the hatchery.	<input type="checkbox"/> Yes <input type="checkbox"/> No N/A X
3. Are you submitting the results to EPA and IDEQ with the DMRs?	<input type="checkbox"/> Yes X <input type="checkbox"/> No

<b>QUALITY ASSURANCE PLAN, Part II.F., (see page 15)</b> According to II.F. "The permittee must develop a QA plan for all monitoring required by this permit. The plan must be developed and implemented within 60 days of coverage under this permit."	
1. Do you have a QA plan?	<input type="checkbox"/> Yes X <input type="checkbox"/> No
2. When did you submit the certification that a plan has been developed?	February 25, 2008

According to II.F.3.a) the QA Plan must include: details on the number of samples, type of sample containers, preservation of samples including temperature requirements, holding times, analytical methods, analytical detection and quantification limits for each parameter, type and number of quality assurance field samples, precision and accuracy requirements, sample preparation requirements, sample shipping methods, and laboratory data delivery requirements.	
3. Does the plan include these details? <b>Note: The QA Plan included the QA plan for Anatek Labs Inc., the analytical lab used for all water testing.</b>	<input type="checkbox"/> Yes <b>X</b> <input type="checkbox"/> No
If not, what is missing?	
According to II.F.3.a) the QA Plan must include: description of flow measuring devices or methods used to measure influent and/or effluent flow at each point, calibration procedures, and calculations used to convert to flow units. If a permittee's facility has multiple effluent discharge points and/or influent points, it must describe its method of compositing samples from all points proportionally to their respective flows.	
4. Does the plan include the flow measuring description?	<input type="checkbox"/> Yes <b>X</b> <input type="checkbox"/> No
5. Does the plan describe the method of compositing samples?	<input type="checkbox"/> Yes <b>X</b> <input type="checkbox"/> No
6. If you elected to take grab samples of influents, does the plan provide evidence of insignificant variability among influent sources?	<input type="checkbox"/> Yes <b>X</b> <input type="checkbox"/> No
7. If you elected to not monitor small discharges that comprise less than 1% of the total raceway flows, does the plan provide justification that effluent quality of these discharges is the same as monitored discharges?	<input type="checkbox"/> Yes <b>X</b> <input type="checkbox"/> No
8. Does the plan include a map(s) of sampling points?	<input type="checkbox"/> Yes <b>X</b> <input type="checkbox"/> No
9. Did you include in your QA plan the quality assurance and control for receiving water monitoring, including the sampling location rationale?	Yes <b>X</b> <input type="checkbox"/> No
10. Does the plan include qualifications and trainings of personnel? <b>The only information in the QA plan is the following statement "On the job training as needed." QA plan lacks detail on training content and qualifications.</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No <b>X</b>

11. Does the plan include the laboratory name and telephone number?		<input type="checkbox"/> Yes X <input type="checkbox"/> No
12. Is facility following / using the QA Plan?		<input type="checkbox"/> Yes X <input type="checkbox"/> No
<b>BEST MANAGEMENT PRACTICES PLAN, Part III., (see page 17)</b> According to Part III.C. "the permittee must develop and implement a BMP Plan which meets the specific requirements listed in Part III.E.		
1. Do you have a BMP plan?  If not on site, is it in the possession of staff when they are working on-site?	<input type="checkbox"/> Yes X <input type="checkbox"/> No  <input type="checkbox"/> Yes <input type="checkbox"/> No	
2. When did you submit the certification that a plan has been developed?	February 25, 2008	
<b>The BMP plan must include the following BMPs:</b> <b>(see page 17)</b>		
1. Chemical Storage a. ensure proper storage to prevent spills,  b. implement procedures for proper containing, cleaning and disposing of spilled material.	<input type="checkbox"/> Yes X <input type="checkbox"/> No  <input type="checkbox"/> Yes X <input type="checkbox"/> No	
2. Structural Maintenance a. routinely inspect rearing and holding units and waste collection containment to identify and promptly repair damage,  How often?  b. Regularly conduct maintenance of rearing and holding units and waste collection and containment systems to ensure their proper function	<input type="checkbox"/> Yes X <input type="checkbox"/> No <b>Daily (M-F)</b>  <input type="checkbox"/> Yes X <input type="checkbox"/> No	

<p><b>3. Training Requirements:</b></p> <p>a. Train personnel in spill prevention and clean-up and disposal of spilled materials.</p> <p>b. Train personnel on proper structural inspection and maintenance of rearing and holding units and waste collection and containment systems.</p> <p><b>Mr. Drobish discussed the training given to staff; however I did not verify the training details in the Plan of Operations.</b></p>	<p><input type="checkbox"/> Yes <b>X</b></p> <p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <b>X</b></p> <p><input type="checkbox"/> No</p>
<p><b>4. Operational Requirements:</b></p> <p>a. Water which is disinfected with chlorine or other chemicals must be treated before it is discharged to waters of the U.S.</p> <p>b. Treatment equipment used to control the discharge of floating, suspended or submerged matter must be cleaned and maintained at a frequency sufficient to prevent overflow or bypass of the treatment unit by floating, suspended, or submerged matter.</p> <p>c. Procedures must be implemented to prevent fish from entering quiescent zones, full-flow and off-line settling basins. Fish which have entered quiescent zones or basins must be removed as soon as practicable.</p> <p>d. All drugs and pesticides must be used in accordance with applicable label directions (FIFRA or FDA)</p> <p>e. Chelated copper compounds and copper sulfate, when used, must be applied to only one raceway at a time.</p> <p>f. Identify and implement procedures to collect, store, and dispose of wastes, such as biological wastes, in accordance with IDAPA §02.04.17 and IDAPA §58.01.02. Such wastes include fish mortalities and other processing solid wastes from aquaculture.</p> <p>g. Implement procedures to control the release of transgenic or non-native fish or their diseases as specified in any permit(s) issued by the Idaho Department of Fish and Game for the importation, transportation, release or sale of such species, in accordance with IDAPA §13.01.10.100.</p> <p>h. Implement procedures to eliminate the release of PCBs from any known sources in the facility, including paint, caulk, or feed</p>	<p><input type="checkbox"/> Yes <b>X</b></p> <p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <b>X</b></p> <p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <b>X</b></p> <p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <b>X</b></p> <p><input type="checkbox"/> No ( <b>not used at site</b>)</p> <p><input type="checkbox"/> Yes <b>X</b></p> <p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <b>X</b></p> <p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <b>X</b></p> <p><input type="checkbox"/> No</p>
<p><b>When was the BMP Plan last updated?</b></p>	<p><b>January 2014</b></p>

<b>A. Drug And Other Chemical Use And Reporting Requirements (see pages 19)</b>	
1. Do you use drugs, pesticides or other chemicals?	<input type="checkbox"/> Yes X <input type="checkbox"/> No
<b>If yes, ask to see the Chemical Log Sheet. (see Appendix F, page 65)</b>	
1. Are records being maintained of all applications?	<input type="checkbox"/> Yes X <input type="checkbox"/> No
2. When an INAD or extralabel drug is used for the first time, you are required to report this orally and in writing to EPA and IDEQ.  Have you used INADs or plan to use INADs or extralabel drugs? If so,... Have you written to EPA and IDEQ that you have signed up to use an INAD or prescription? (page 62)  Have you provided an oral report to EPA and IDEQ of an INAD or prescription use? (page 63)  Have you provided a written report to EPA and IDEQ of an INAD or prescription use? (page 63)	<input type="checkbox"/> Yes X <input type="checkbox"/> No <input type="checkbox"/> Yes X Date: <input type="checkbox"/> No  <input type="checkbox"/> Yes X Date: <b>February 15, 2013</b> <input type="checkbox"/> No  <input type="checkbox"/> Yes X Date: <b>July 7, 2000 and on February 22, 2013</b> <input type="checkbox"/> No
<b>B. Structural Failure (see page 39)</b>	
Remind the interviewee of this new requirement: Failure or damage to the facility must be reported to EPA and IDEQ orally within 24 hours and in writing within five days when there is a resulting discharge of pollutants to waters of the U.S.	<b>Reviewed with staff</b> <input checked="" type="checkbox"/> Yes X <input type="checkbox"/> No
<b>C. Spills of feed, drugs, pesticides or other chemicals (see page 39)</b>	
Remind the interviewee of this new requirement: The permittee must monitor and report to EPA and IDEQ any spills that result in a discharge to waters of the United States; these must be reported orally within 24 hours and in writing within five days.	<b>Reviewed with staff</b> <input checked="" type="checkbox"/> Yes X <input type="checkbox"/> No



<b>D. Annual Report of Operations (see page 40)</b> Remind the interviewee of this requirement: The permittee must prepare and submit an annual report of operations by January 20 <sup>th</sup> of each year to EPA and IDEQ. (see Appendix G, page 69-70 for form)	<b>Reviewed with staff</b> Yes <input checked="" type="checkbox"/> X No <input type="checkbox"/>
1. Did you submit the last report as required?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> X <input type="checkbox"/> No
2. Is the annual report complete? (Check the report against the required elements on pages 69-70.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> X <input type="checkbox"/> No
Ask to see the annual logs of production. 3. Are the logs consistent with what is reported in the annual report?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> X <input type="checkbox"/> No
<b>Was the facility able to provide all the required paper documentation requested?</b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> X <input type="checkbox"/> No
<b>FACILITY PHYSICAL INSPECTION</b>  Objectives of the facility inspection include: identifying all discharges to the surface waters from the facility; observing and recording prohibited discharges or practices; and noting any problems. Many of these questions are subjective.	
1. Any excessive feed in the raceways?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> X
2. Any excessive solids stirred up in raceways?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> X
3. Are all the barrier dam boards in place and level? <b>Facility uses adjustable stand pipes to maintain levels.</b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> X <input type="checkbox"/> No
4. Any excessive solids built up in quiescent zones?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> X
5. Any excessive solids going over the dam boards.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> X
6. Any fish observed in the quiescent zones?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> X

2. Are effluent sample locations adequate?	<input type="checkbox"/> Yes <b>X</b> <input type="checkbox"/> No
3. Are samples refrigerated / iced down after sampling?	<input type="checkbox"/> Yes <b>X</b> <input type="checkbox"/> No
4. Are samples iced down during transportation to contract Lab?	<input type="checkbox"/> Yes <b>X</b> <input type="checkbox"/> No
<b>Solids Containment and Storage</b>	
1. Is the solids disposal area adequate?	<input type="checkbox"/> Yes <b>X</b> <input type="checkbox"/> No
2. Removed solids prevented from reentry to navigable waters?	<input type="checkbox"/> Yes <b>X</b> <input type="checkbox"/> No
3. Does the facility land apply solids or irrigate with or apply wastewater?	<input type="checkbox"/> Yes <b>X – However, no solids were applied in 2013 or so far in 2014.</b> <input type="checkbox"/> No
<b>Inspection Conclusion Data Sheet (ICDS) information</b>	
1. Did you observe deficiencies (potential violations) during the on-site inspection?	<input type="checkbox"/> Yes- <b>X</b> <input type="checkbox"/> No
2. If so, did you communicate them to the facility during the inspection?	<input type="checkbox"/> Yes - <b>X</b> <input type="checkbox"/> No
3. Did the facility or operator take any corrective actions	<input type="checkbox"/> Yes <b>Not during the inspection</b> <input type="checkbox"/> No - <b>X</b>
4. Did you provide general compliance assistance during the inspections?	<input type="checkbox"/> Yes - <b>X</b> <input type="checkbox"/> No
<p>Questions asked by the facility during the course of the inspection and follow-up discussions:</p> <p>1) We're digging back into records that are older than 5-years that we've migrated out of our normal files, did EPA or DEQ extend this retention request (pg 22) - if so, how long should we be retaining?</p>	<p>1. Since this was my first inspection of this facility and my pre-inspection review did not find the various certifications and notices required in the permit, I chose to ask for them. As far as I know there has not been a</p>

<p>2) If I understand correctly, pg 62 and 63 are only required when a INAD is used for the first time on a facility (pg 19) - is that your understanding as well? As I mentioned, we have pretty good records and it surprises me not to see these more often - that may explain why I'm not finding these pages.</p> <p>3) Once an INAD or Extralabel drug is established, can it then be reported annually as part of the chemical use log of the Annual Report?</p>	<p>change in the record retention requirement. However, it is always a good practice to keep key data (drug use etc.) for historical purposes.</p> <p>2. I would agree with your assessment that reporting is only required for first time use.</p> <p>3. I agree with the facility that reporting of the drug information can be reported on the Annual Report. On page 70 of the permit, in the annual report Section VIII. Chemical Usage reporting includes reporting of pesticides and drugs.</p>
<p>5. Did you provide site-specific compliance assistance?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No X</p>
<p><b>AREAS OF CONCERN:</b></p>	<p>1. The Quality Assurance plan did not have adequate detail for training personnel in sampling and flow measurement techniques.</p> <p>2. Continued use of non-standard flow measuring devices – Notice of continuing Noncompliance February 9, 2011.</p> <p>3. During months of March to July, the diversion of 10% of the nursery effluent flow around the clarifiers and directly to the river.</p>

## Photographic Documentation

**Name of Facility:** Dworshak Fish Hatchery NPDES Inspection

**Inspector(s):** Michael Spomer and Nicolas Hiebert

**Inspection Date:** Tuesday, July 22, 2014

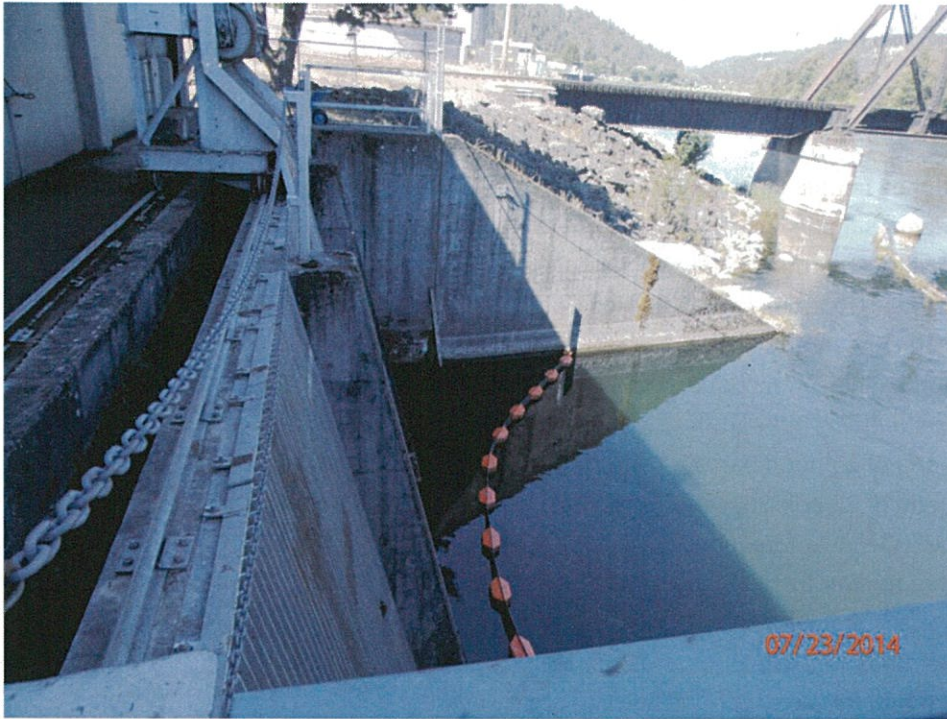
**Purpose of Inspection:** Compliance Inspection for permit IDG-13000-3



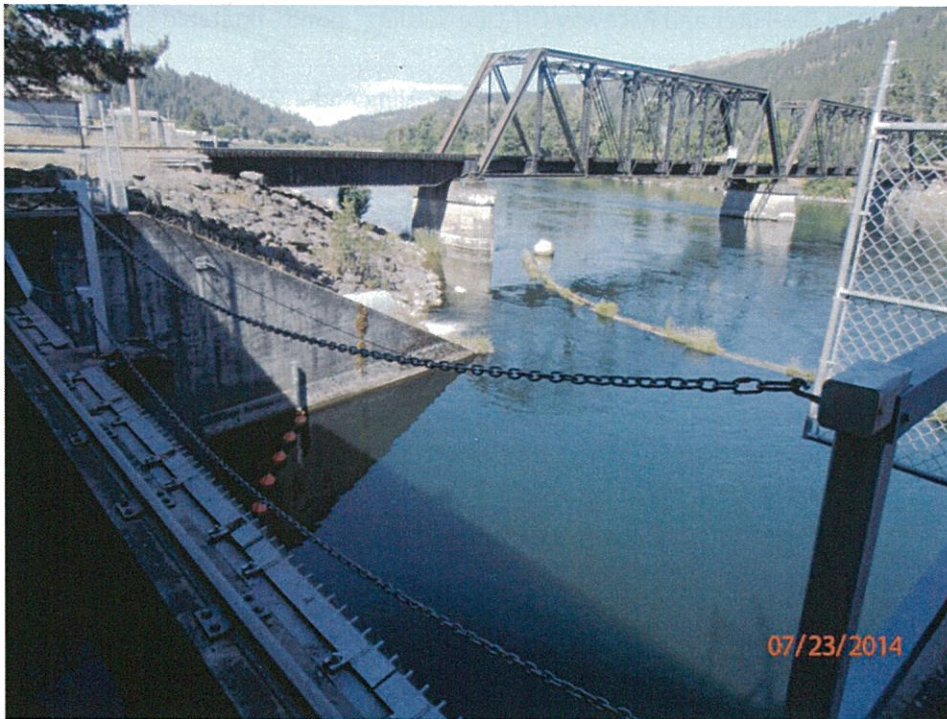
**Publish Date:** Monday 18 August 2014

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1. Photograph 1: River influent sample location 009A



2. Photograph 2: River influent sample location 009A





3. Photograph 3: Influent water treatment area - Vacuum Degassers



4. Photograph 4: Influent water treatment area - Packed Columns





5. Photograph 5: Nursery Building Interior



6. Photograph 6: Incubation building - incubation trays





7. Photograph 7: Incubation building influent flow meter



8. Photograph 8: Effluent end of 25 pond Barrow Pond reuse system 1 (fish raceways)



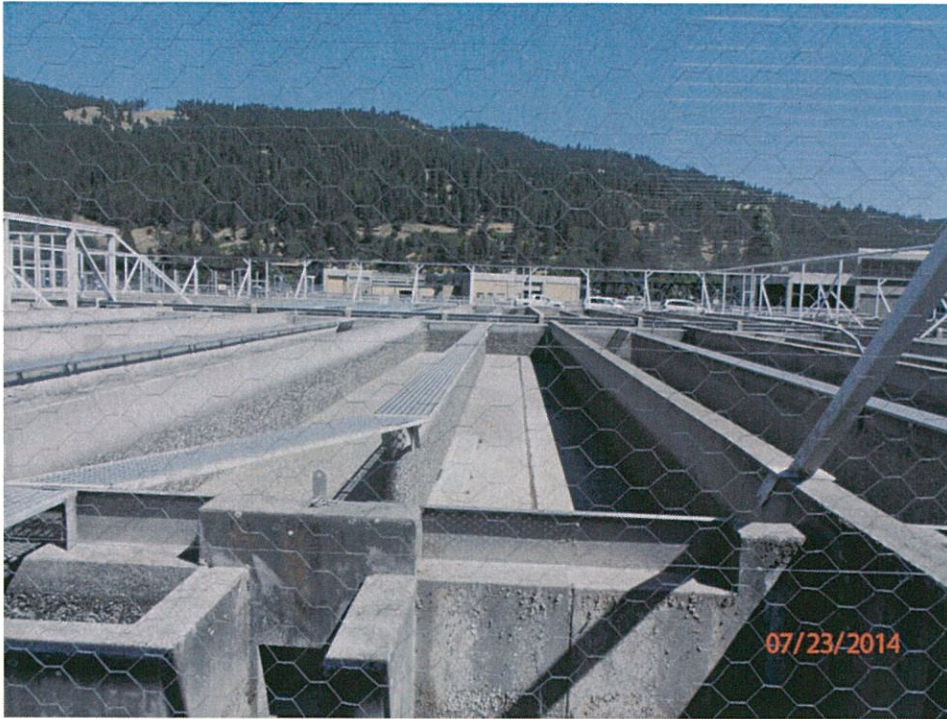


9. Photograph 9: Effluent end of 25 pond Barrows Pond reuse system 1 - section where water can be diverted during clean out (Cleaning Channel)



10. Photograph 10: Discharge to river from Burrows Pond reuse systems 1 and 2



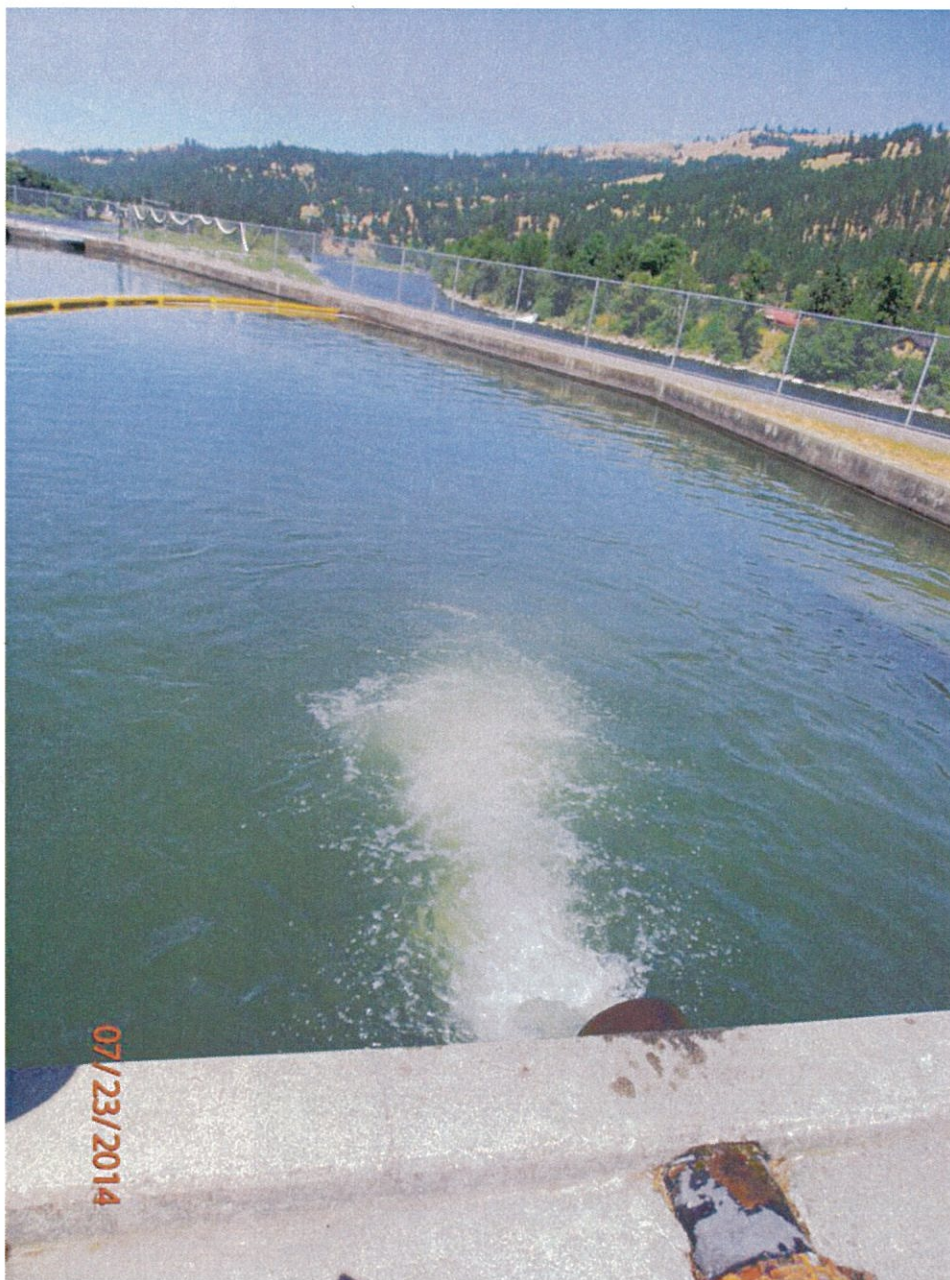


11. Photograph 11: Empty ponds at 34 Burrows Pond reuse system

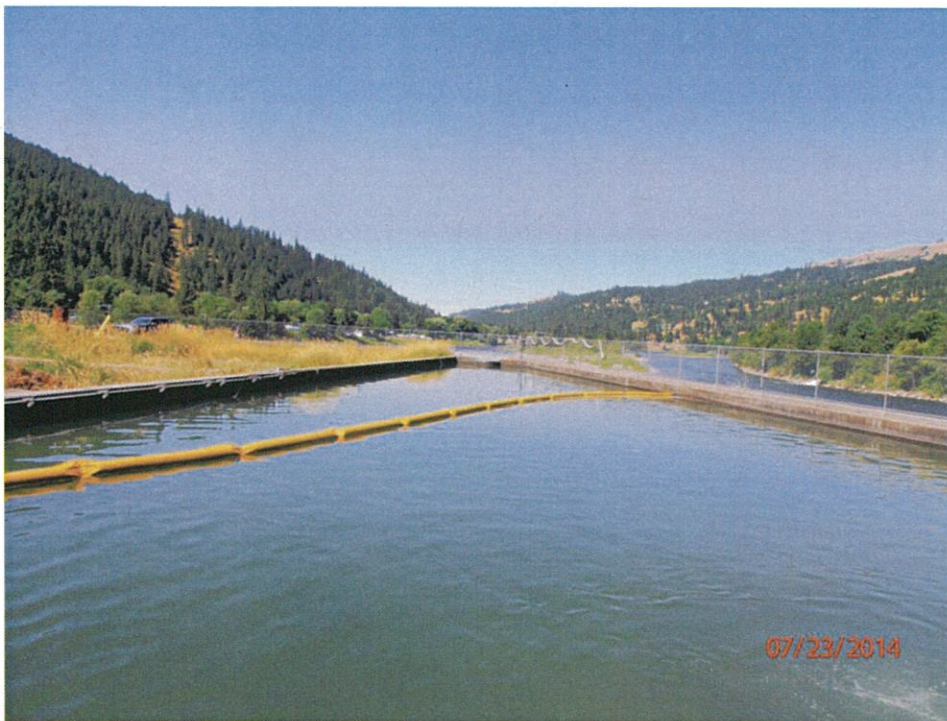


12. Photograph 12: Bio-Filter Beds





13. Photograph 13: Bio-Filter and Raceway Off-line Settling pond - influent end



14. Photograph 14: Bio-Filter and Raceway Off-Line Settling pond



15. Photograph 15: solids drying beds and storage area



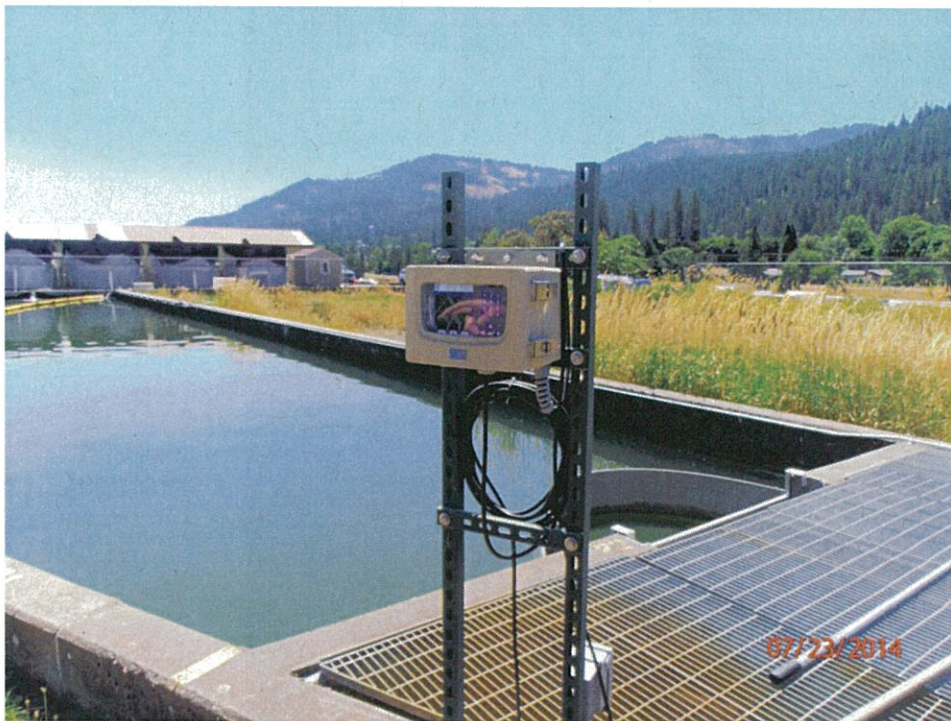


16. Photograph 16: Outlet end of the Bio-Filter and Raceway Off-Line Settling pond - floatable solids restriction weir

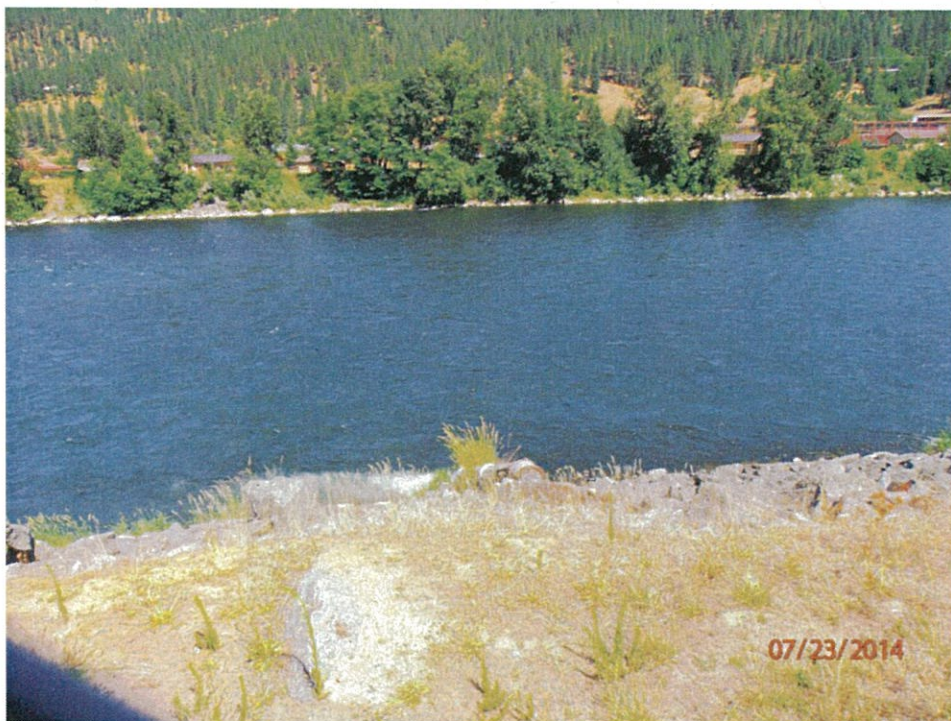


17. Photograph 17: Outlet end of the Bio-Filter and Raceway Off-Line Settling pond





18. Photograph 18: Bio-Filter and Raceway Off-Line Settling pond effluent flow meter



19. Photograph 19: River Discharge from Bio-Filter and Raceway Off-Line Settling ponds





20. Photograph 20: Interior of chemical storage shed (secondary containment floor)



21. Photograph 21: Chemical storage shed





22. Photograph 22: Flow meter readout for Bio-Filter influent Off Line Settling Pond

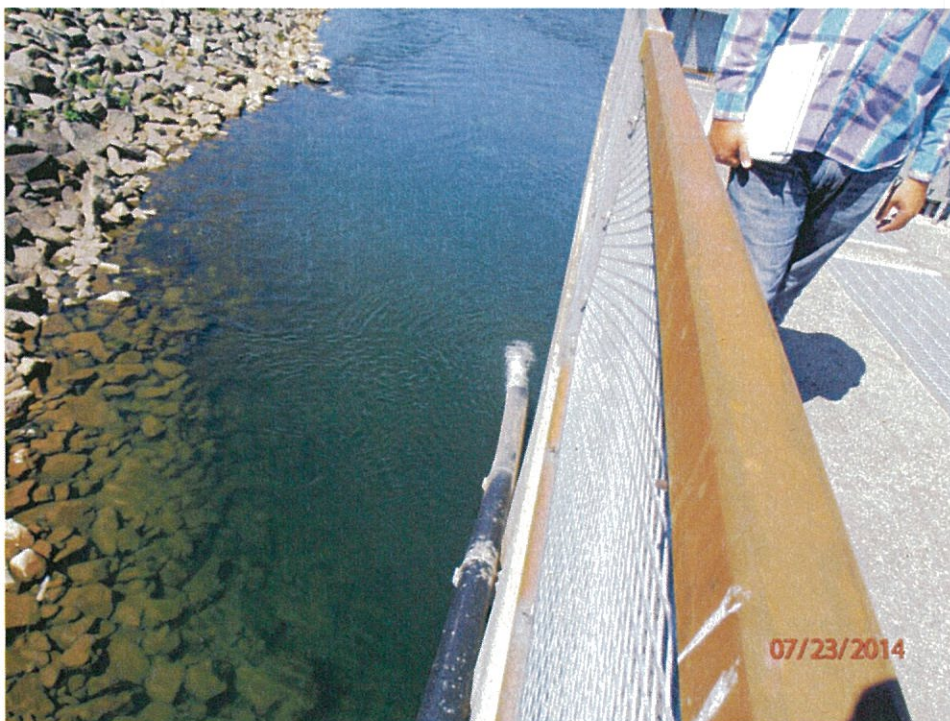


23. Photograph 23: SCS raceways

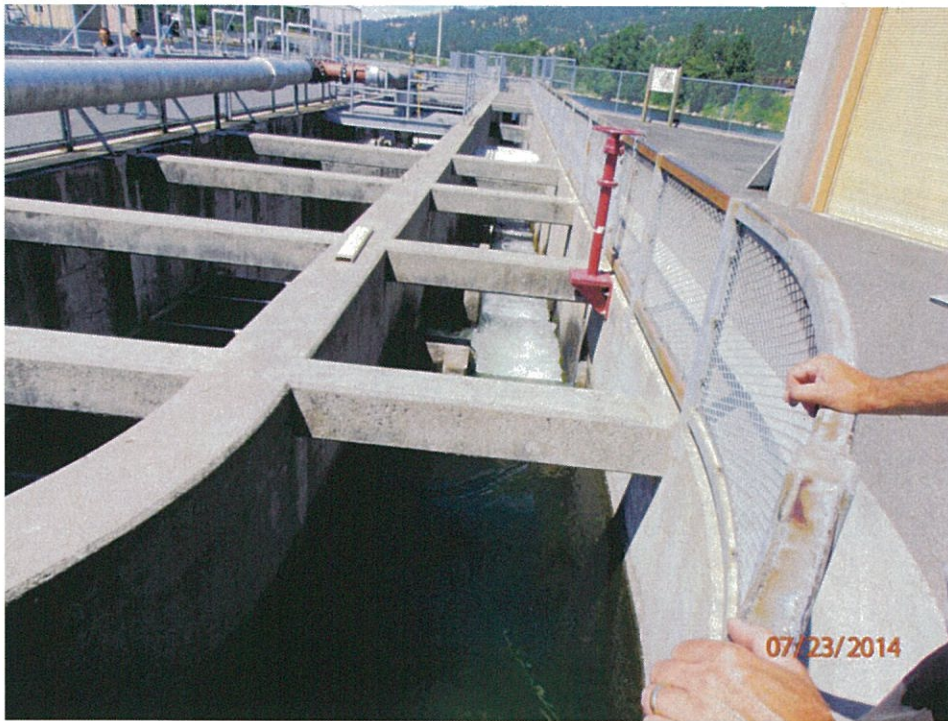




24. Photograph 24: SCS raceways drain cleanout plug (Mud Valve)



25. Photograph 25: Effluent discharge line at river for the SCS raceways (Non-Cleaning effluent)



26. Photograph 26: Incoming fish ladder for returning fish from ocean